

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

No. 1:18-cr-060

Hon. Gordon J. Quist  
United States District Judge

COREY JAMES CRIBBS II, also known as  
Akil McKinney,  
“Ghost,” and  
“Bam Bam,”

JALEN OMARI MOORE, also known as  
Javante Marcellus-Carvell Dunbar,  
JAMIE LAPAUL WOOD,  
RADAWN ELAINE UNDERWOOD, and  
TAJIA NAQUE-MAGNOLIA PEREZ,

FIRST SUPERSEDING  
INDICTMENT

Defendants.

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The Grand Jury charges:

**COUNT ONE**

**(Conspiracy to Distribute and Possess with Intent to Distribute Methamphetamine)**

From on or about an unknown date in January of 2018, through and including March 4, 2018, in Calhoun County, in the Southern Division of the Western District of Michigan, and elsewhere,

COREY JAMES CRIBBS II, also known as  
Akil McKinney,  
“Ghost,” and  
“Bam Bam,”  
JALEN OMARI MOORE, also known as  
Javante Marcellus-Carvell Dunbar,  
JAMIE LAPAUL WOOD,  
RADAWN ELAINE UNDERWOOD, and  
TAJIA NAQUE-MAGNOLIA PEREZ

did knowingly, intentionally and unlawfully combine, conspire, confederate and agree with one another, and with other persons, both known and unknown to the grand jury, to possess with intent to distribute and to distribute, more than five hundred (500) grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

21 U.S.C. § 846

21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(A)(viii)

**COUNT TWO**  
**(Possession with Intent to Distribute Methamphetamine)**

On or about March 4, 2018, in Kalamazoo County, in the Southern Division of the Western District of Michigan, and elsewhere,

COREY JAMES CRIBBS II, also known as  
Akil McKinney,  
“Ghost,” and  
“Bam Bam,”  
JALEN OMARI MOORE, also known as  
Javante Marcellus-Carvell Dunbar,  
JAMIE LAPAUL WOOD,  
RADAWN ELAINE UNDERWOOD, and  
TAJIA NAQUE-MAGNOLIA PEREZ

did knowingly, intentionally and unlawfully possess with intent to distribute and did aid, abet and cause another to possess with intent to distribute, more than five hundred (500) grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

21 U.S.C. § 841(a)(1)  
21 U.S.C. § 841(b)(1)(A)(viii)  
18 U.S.C. § 2

**COUNT THREE**  
**(Interstate Travel in Aid of Racketeering)**

On or about March 4, 2018, in Kalamazoo County, in the Southern Division of the Western District of Michigan, and elsewhere,

JALEN OMARI MOORE, also known as  
Javante Marcellus-Carvell Dunbar,  
JAMIE LAPAUL WOOD,  
RADAWN ELAINE UNDERWOOD, and  
TAJIA NAQUE-MAGNOLIA PEREZ

did travel in interstate commerce from the state of New Mexico to the Western District of Michigan with intent to promote, manage, establish, carry on or facilitate the promotion, management, establishment, or carrying on of an unlawful activity, that is, the illegal distribution of controlled substances in violation of Title 21, United States Code, Section 841(a)(1); and thereafter did perform and attempt to perform acts to otherwise promote, or facilitate the promotion, management, establishment or carrying on of such unlawful activity, in that they did obtain, possess and transport more than five hundred (500) grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, which was to be distributed in Calhoun County, Michigan.

18 U.S.C. § 1952(a)(3)(A)

21 U.S.C. § 841(a)(1)

18 U.S.C. § 2

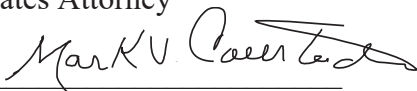
A TRUE BILL



GRAND JURY FOREPERSON

ANDREW BYERLY BIRGE

United States Attorney



MARK V. COURTADE (P32666)

Assistant United States Attorney